

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5**

**IN THE MATTER OF:**

**Strong Steel Products L.L.C.  
6464 Strong St.  
Detroit, MI 48211**

**ATTENTION:**

**Lisa Carroll  
Environmental Director  
[lisa.carroll@fptscrap.com](mailto:lisa.carroll@fptscrap.com)**

**Request to Provide Information Pursuant to the Clean Air Act**

The U.S. Environmental Protection Agency is requiring Strong Steel Products, L.L.C., a subsidiary of Ferrous Processing & Trading Co., (Strong Steel or you) to submit certain information about its facility at 6464 Strong St, Detroit, MI 48211. Appendix A provides the instructions needed to answer this information request, including instructions for electronic submissions. Appendix B specifies the information that you must submit. You must send this information to us within 30 calendar days after you receive this request.

We are issuing this information request under Section 114(a) of the Clean Air Act (the CAA), 42 U.S.C. § 7414(a). Section 114(a) authorizes the Administrator of EPA to require the submission of information to verify compliance with state implementation plans and other provisions of the Clean Air Act. The Administrator has delegated this authority to the Director of the Enforcement and Compliance Assurance Division, Region 5.

Strong Steel owns and operates an emission source at the Detroit, Michigan facility. We are requesting this information to determine whether your emission source is complying with 40 C.F.R. Part 82, Subpart F – Recycling and Emissions Reductions and the Michigan State Implementation Plan.

At this time, EPA Region 5 is not accepting any hard-copy document deliveries. If possible, we ask Strong Steel to upload all required information to the secured web-link shared with you at the time you received this request. If you did not receive a web-link, or if you are having technical difficulties, you must contact Brittany Cobb at [cobb.brittany@epa.gov](mailto:cobb.brittany@epa.gov) or 312-353-1248 to make arrangements to submit your response.

Strong Steel must submit all required information under an authorized signature with the following certification:

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to Section 113(c)(2) of the Clean Air Act and 18 U.S.C. §§ 1001 and 1519.

You may assert a claim of business confidentiality under 40 C.F.R. Part 2, Subpart B for any part of the information you submit to us. Information subject to a business confidentiality claim is available to the public only to the extent, and by means of the procedures, set forth at 40 C.F.R. Part 2, Subpart B. If you do not assert a business confidentiality claim when you submit the information, EPA may make this information available to the public without further notice.

This information request is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 *et seq.*, because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.

We may use any information submitted in response to this request in an administrative, civil or criminal action.

Failure to comply fully with this information request may subject Strong Steel to an enforcement action under Section 113 of the CAA, 42 U.S.C. § 7413.

You should direct any questions about this information request to Brittany Cobb at 312-353-1248.

for

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Michael D. Harris  
Division Director  
Enforcement and Compliance Assurance  
Division

## **Appendix A**

When providing the information requested in Appendix B, use the following instructions and definitions.

### **Instructions**

1. Provide a separate narrative response to each question and subpart of a question set forth in Appendix B.
2. Precede each answer with the number of the question to which it corresponds and, at the end of each answer, identify the person(s) who provided information used or considered in responding to that question, as well as each person consulted in the preparation of that response.
3. Indicate on each document produced, or in some other reasonable manner, the number of the question to which it corresponds.
4. When a response is provided in the form of a number, specify the units of measure of the number in a precise manner.
5. Where information or documents necessary for a response are neither in your possession nor available to you, indicate in your response why the information or documents are not available or in your possession, and identify any source that either possesses or is likely to possess the documents or information.
6. If information not known or not available to you as of the date of submission later becomes known or available to you, you must supplement your response. Moreover, should you find at any time after the submission of your response that any portion of the submitted information is false or incorrect, you must notify EPA as soon as possible.

### **Electronic Submissions**

To aid in our electronic recordkeeping efforts, we request that you provide all documents responsive to this information request in an electronic format according to paragraphs 1 through 6, below. These submissions are in lieu of hard copy.

1. Provide all responsive documents in Portable Document Format (PDF) or similar format, unless otherwise requested in specific questions. If the PDFs are scanned images, perform at least Optical Character Recognition (OCR) for “image over text” to allow the document to be searchable. Submitters providing secured PDFs should also provide unsecured versions for EPA use in repurposing text.
2. When specific questions request data in electronic spreadsheet form, provide the data and corresponding information in editable Excel or Lotus format, and not in image format. If Excel or Lotus formats are not available, then the format should allow for data to be used in calculations by a standard spreadsheet program such as Excel or Lotus.

3. Provide submission to the secure web-link provided by EPA.
4. Provide a table of contents of all electronic documents submitted in response to our request so that each document can be accurately identified in relation to your response to a specific question. We recommend the use of electronic file folders organized by question number.
5. Please submit documents claimed as confidential business information (CBI) in separate file folders apart from the non-confidential information. This will facilitate appropriate records management and appropriate handling and protection of the CBI.
6. Certify that the attached files have been scanned for viruses and indicate what program was used.

### **Definitions**

All terms used in this information request have their ordinary meaning unless such terms are defined in the CAA, 42 U.S.C. §§ 7401 *et seq.*, 40 C.F.R. Part 82, Subpart F, or Michigan's State Implementation Plan.

1. "Metal shredding operation" means a unit that crushes, grinds, granulates, shears or breaks ferrous and non-ferrous metals scrap into a size suitable for further processing.
2. "Metals separation process" means a process that separates either ferrous metals from the shredded material or non-ferrous metals from the shredded material. This process follows a metal shredding operation.
3. "Metal shredding operation and associated operations" means the metal shredding operation, as defined above, metals separation process, as defined above, in addition other processes before or after metal shredding and metal separation.

## **Appendix B**

### **Information You Are Required to Submit to EPA**

Strong Steel must submit the following information pursuant to Section 114(a) of the CAA, 42 U.S.C. § 7414(a):

1. The owner(s) and operator(s) of the facility. Include the full company name, type of legal structure (individual, partnership, corporation, limited liability corporation (LLC), limited liability partnership (LLP), association, or other legal entity), the State of incorporation (if any), assumed business name(s), and names of all corporate officers, partners, members, and/or registered agents.
2. For the metal shredding operation and its associated processes, including the metals separation process at the facility:
  - a. In an electronic, unlocked spreadsheet, provide the following:
    - i. The NAICS codes for the type of work conducted at the facility;
    - ii. Date construction commenced for the metal shredding operation and its associated processes, including the metals separation process;
    - iii. Date commercial operation began for the metal shredding operation and its associated processes, including the metals separation process;
    - iv. Date the metal shredding operation and its associated processes, including the metals separation process, were removed from service (if applicable);
    - v. Maximum conveyor speed (feet/minute) and width (feet) of the metal shredding operation;
    - vi. Motor rating (in hp or kW) for the shredder. Additionally, indicate if the motor has been modified from an as-designed rating;
    - vii. Brake horsepower of each engine, including for any spare engines, for the metal shredding operation;
    - viii. Manufacturer of the metal shredding device(s);
    - ix. Maximum processing capacity, in short tons per hour;
    - x. Any air pollution control equipment associated with the metal shredding operation;
    - xi. Whether non-ferrous metal separation occurs at the metal shredding operation;
    - xii. The approximate percentage of shredded materials that are MVACs or MVAC-like appliances; and
    - xiii. Any other emissions controls or upgrades not listed above, the date those controls commenced operation, and the design outlet emissions rate for particulate matter, volatile organic compounds (VOCs), or metals, as well as the removal efficiency specifications and manufacturer guarantees for those controls and upgrades.

- xiv. Any emissions controls or updates planned for installation in the next two years, and the design outlet emissions rate for particulate matter, VOCs or metals and removal efficiency specifications and guarantees for those controls and upgrades.
  - b. In a separate electronic, unlocked spreadsheet, provide the following daily information, if daily records are not kept state that in your response and provide monthly. This request covers the time period from January 1, 2020 to the present:
    - i. Total shredder throughput in short tons;
    - ii. Shredder throughput of light iron (ferrous) in short tons;
    - iii. Shredder throughput of non-ferrous metal in short tons;
    - iv. Shredder throughput of MVACs or MVAC-like appliances in short tons; and
    - v. Hours of operation for the metal shredding operation.
  - c. For the water spray control system, provide all records of water used, in gallons per month, from January 1, 2020 to the present, for each metal shredding operation.
  - d. Provide records of all explosions, flame events, and air bag activations or other similar events that occurred at any shredding operation in the past three years.
3. Provide a process flow diagram for ferrous and non ferrous scrap, including white goods/appliances, vehicles and radiators. Include, but not limited to, weigh stations, fluid draining stations, CFC recovery stations, scrap pile, shredder, metal shredding operation and metal separation processes.
  4. Provide a copy of all air construction permits, installation permits, and operating permits issued by any permitting authority (federal, state, and local), including associated permit applications, along with all documents required to be kept under the permit.
  5. Provide a detailed explanation of the scheduled maintenance and shutdowns for the metal shredding device(s) and metal separation process(es), if any. Include copies of standard operation procedures, preventative maintenance checklists, and any other documents relating to scheduled maintenance or shutdowns.
  6. Provide any documents containing information about VOC emissions from the metal shredding device(s). Include stack tests, engineering studies, emissions calculations, annual emissions reports from 2017 to the present, applicability studies, permit applications, and related correspondence.
  7. Provide the number of white goods/appliances, vehicles and radiators received/accepted per month from January 1, 2020 to the present. Provide an estimate only if the number is not recorded.

8. Provide the year(s) in which Strong Steel began accepting white goods/appliances, vehicles and radiators.
9. Provides copies of all signed verification statements and/or contracts regarding refrigerants (CFCs, HCFCs, and substitute refrigerants) from January 1, 2020 to the present.
10. Provide any training materials given to employees related to screening incoming appliances and rejecting appliances that do not have intact condenser lines, along with records of employees receiving these trainings.
11. Provide any logs or other records documenting the rejection of appliances with cut condenser lines from January 1, 2020 to the present.
12. Describe the steps Strong Steel took to comply with the 2005 Consent Agreement and Final Order (CAFO).
13. Provide the number of employees at Strong Steel and at Ferrous Processing and Trading.
14. Provide the location(s) of all subsidiary facilities of Ferrous Processing and Trading and facilities owned and/or operated by Ferrous Processing and Trading that have shredders in Illinois, Indiana, Michigan, Minnesota, Ohio, and Wisconsin. Indicate the maximum processing capacity, in short tons per hour, of each shredder at each location.